

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 23-md-03084-CRB

This Document Relates to:

ALL CASES

**DECLARATION OF MAYA R. KALONIA
IN SUPPORT OF ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE FILED UNDER SEAL**

I, Maya R. Kalonia, declare:

1. I am an attorney in the law firm of Girard Sharp, LLP, and counsel for Plaintiffs in the above-captioned Multi-District Litigation. I am a member of the State Bar of California and am admitted to practice before this Court. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein.

2. Because the materials at issue were designated by Uber as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL", Plaintiffs filed the following under seal:

Document	Description	Designating Party
[Unredacted] Joint Letter Regarding 30(b)(6) Topics and Written Discovery	Portion of briefing referring to documents and testimony designated highly confidential and confidential	Uber
Exhibit A	Excerpts of Uber Defendants' August 18, 2025 Objections and Responses to Plaintiffs' Interrogatories and Requests for Admission in Lieu of 30(b)(6) depositions designated as highly confidential	Uber

Exhibit B	Excerpts of the August 21, 2025 deposition transcript of Chad Dobbs designated as highly confidential	Uber
Exhibit C	Uber-produced document bates stamped UBER_JCCP_MDL_003341903 and Exhibit 1897 designated as highly confidential	Uber
Exhibit D	Uber-produced document bates stamped UBER_JCCP_MDL_0003276626 designated as confidential	Uber
Exhibit E	Uber-produced document bates stamped UBER_JCCP_MDL_002618039 designated as confidential	Uber

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 8, 2025 in Oakland, California.

/s/ Maya R. Kalonia
Maya R. Kalonia